

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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PAVEL POGODIN AND ALEXANDER
PROKHOROV,

Plaintiffs,

- against -

CRYPTORION INC., ZURAB TSITSUASHVILI
A/K/A ZURAB ASHVIL, AND ZVI BEN-ZVI,

Defendants.

18 CIV. 791(ENV)(SMG)

**NOTICE OF PLAINTIFFS'
MOTION FOR: (I) SANCTIONS
AGAINST DEFENDANT ZURAB
TSITSUASHVILI PURSUANT TO
FEDERAL RULES OF CIVIL
PROCEDURE 37; AND (II) FOR
DISCLOSURE OF DEFENDANT
ZURAB TSITSUASHVILI'S
PERSONAL INCOME TAX
RETURNS AND OTHER
PERSONAL FINANCIAL
RECORDS FOR THE YEARS 2017
AND 2018**

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ZURAB TSITSUASHVILI,

Third-Party Plaintiff,

- against -

GIVI TOPCHISHVILI,

Third-Party Defendant.

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PLEASE TAKE NOTICE that, upon the Declaration of Daniel Akselrod in Support of Plaintiffs' Motion for: (i) sanctions against Defendant Zurab Tsitsuashvili pursuant to Federal Rules of Civil Procedure 37; and (ii) for disclosure of Defendant Zurab Tsitsuashvili's personal income tax returns for the years 2017 and 2018 (the "Motion") and the exhibits thereto; the Declaration of Eric Wertheim in Support of the Motion, dated November 11, 2019, and the exhibits thereto; the Declaration of Daniel Akselrod in Support of the Motion, dated November 11, 2019, and the exhibits thereto; and the Memorandum of Law in Support of the Motion, Plaintiffs, Pavel Pogodin and Alexander Prokhorov, will move this Court, before the Honorable Steven M. Gold, at the United States District Court, 225 Cadman Plaza East, Brooklyn, NY 11201, for an Order entering sanctions against Defendant Zurab Tsitsuashvili pursuant to Federal Rules of Civil Procedure 37 and directing Defendant Zurab Tsitsuashvili to produce personal income tax returns other personal financial records for the years 2017 and 2018, including bank statements and cryptocurrency "wallet" records for the years 2017 and 2018.

Dated: New York, New York
November 11, 2019

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